

# **WISHA REGIONAL DIRECTIVE**

**WISHA Services**

**Department of Labor and Industries**

## **30.25**

# **Fall Protection During Excavation & Trenching Operations**

**Date: June 29, 2005**

### **I. Background**

During the excavation and trenching process, fall hazards may be created that pose a danger to employees. Over the past several years, WISHA Services has received many questions regarding what fall protection requirements apply during trenching and excavation operations. WISHA's previous excavation standard exempted employees directly involved in trenching or excavation operations from the fall protection requirements. The current excavation rule requires that all shafts, wells, pits and remotely-located excavations be adequately barricaded or covered and walkways crossing over an excavation must have standard guardrails which comply with Chapter 296-155 WAC, Part K.

### **II. Scope and Application**

This regional directive provides guidance to WISHA consultation and enforcement staff regarding the appropriate application of the fall protection requirements in relation to excavation and trenching. It replaces all previous guidance on the topic, whether formal or informal, and will remain in effect indefinitely.

### **III. Special Compliance and Consultation Protocols**

#### **A. *Are employees directly involved in the excavation process exempt from the fall protection requirements of Chapter 296-155 WAC, Part C-1 and Part K?***

When employees *directly* involved with the excavation process are on the ground at the top edge of an excavation, WISHA enforcement and consultation staff must consider these employees exempt from the fall protection requirements in Chapter 296-155, Part C-1 and Part K WAC.

For excavations greater than 10 feet in depth that require employees to enter the excavation and be on the vertical wall of the excavation, on the protective system or on any other structure in the excavation, WISHA enforcement and

consultation staff must appropriately apply the requirements of Chapter 296-155 WAC, Part C-1, including the requirement for a fall protection work plan, when the employees are exposed to a fall hazard of 10 feet or greater.

The following persons are those to be considered directly involved in the excavation process:

- Foreman of the crew
- Signal person
- Employee hooking on pipe or other materials
- Grade person
- County or city inspectors inspecting the excavation or trench

*B. How should WISHA enforcement and consultation staff cite an employer when worker(s) that are not directly involved in the excavation process are exposed to the hazard of falling into the excavation?*

Employers of employees that are not directly involved in the excavation process must ensure their employees are protected from the fall hazard into an excavation as follows:

1. Excavations 4 feet in depth but less than 10 feet in depth. For excavations with nearly vertical walls, WISHA enforcement and consultation staff using enforcement discretion must not cite an employer for employee exposure to fall hazards of less than 10 feet.
2. Excavations 10 feet or greater in depth. WISHA enforcement and consultation staff must appropriately apply the requirements of Part C-1 and Part K of Chapter 296-155 WAC when employees not directly involved with the excavation are exposed to the hazard of falling into an excavation that is 10 feet or greater in depth.

*C. Should WISHA enforcement and consultation staff issue a citation to an employer who has employees who are not directly involved in the excavation process but exposed to the edge of an excavation 10 feet or greater in depth that uses appropriate sloping of the side-walls as the protective system?*

No, a sloped system would expose employees to a possible slipping or sliding hazard, but it would not be considered a fall hazard and therefore, not a violation of Part C-1 or Part K of Chapter 296-155 WAC.

Approved: \_\_\_\_\_  
Mel James, Acting Senior Program Manager  
WISHA Policy & Technical Services

For further information about this or other WISHA Regional Directives, you may contact WISHA Policy & Technical Services at P.O. Box 44648, Olympia, WA 98504-4648 -- or by telephone at (360)902-5503. You also may review policy information on the WISHA Website (<http://www.lni.wa.gov/Safety/>).